

REMARKS

Claims 1-69 are pending in the present application. Reconsideration of the present application is respectfully requested.

In the Office Action, claims 1-69 were rejected under 35 U.S.C. § 102(e) as allegedly being anticipated by Pallini (U.S. Patent Publication 2001/0045286). Applicants respectfully traverse the Examiner's rejections.

It is respectfully submitted that the Examiner's rejection set forth in the Office Action does not comply with the duty of the Examiner to establish a prima facie basis for rejecting the pending claims.

“The examiner cannot sit mum, leaving the applicant to shoot arrows in the dark hoping to somehow hit a secret objection harbored by the examiner. The ‘prima facie’ case notion, the exact origin of which appears obscure..., seemingly was intended to leave no doubt among examiners that they must state clearly and specifically any objections (the prima facie case) to patentability, and give the applicant fair opportunity to meet those objections with the evidence and argument. To that extent the concept serves to level the playing field and reduces the likelihood of administrative arbitrariness.”

In re Oetiker, 977 F.2d 1443, 24 U.S.P.Q.2d 1443, 1447 (Fed. Cir. 1992) (Plager, J., concurring).

The Examiner's rejections are nothing more than a restatement of the language of the pending claims and conclusory statements, *e.g.*, “clearly anticipated.” The rejections are made without any specific record support or citation.

More specifically, the basis for the Examiner's rejection is so vague and ambiguous that a proper response cannot be formulated. That is, since the Examiner did not identify what specific components or structures disclosed in Pallini correspond to the limitations in the pending claims, a reasoned response to the Examiner's rejection is impossible. Simply put, the undersigned cannot understand the Examiner's rejection because it is so vague and ambiguous. For example, at no point does the Examiner identify what specific structure in Pallini he believes constitutes

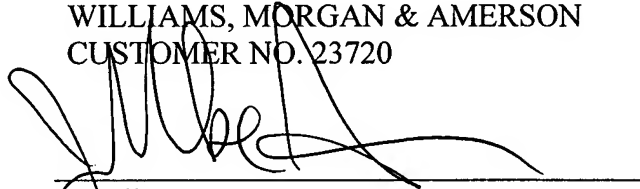
the first component, the first end that is coupled to the first component, the second component, the plurality of locking segments that are adapted to secure the first component to the second component, the locking mandrel, or the at least three discrete, spaced apart engagement areas. Without such specifics, the rejection is so vague that a reasoned response cannot be formulated.

The undersigned respectfully requests that the Examiner provide specific citations by reference number to the structures or components of Pallini that the Examiner believes meets the limitations of claim 1.

The Examiner is invited to contact the undersigned attorney at (713) 934-4055 with any questions, comments or suggestions relating to the referenced patent application.

Respectfully submitted,

WILLIAMS, MORGAN & AMERSON
CUSTOMER NO. 23720



Date: March 8, 2006

J. Mike Amerson
Reg. No. 35,426
10333 Richmond, Suite 1100
Houston, Texas 77042
(713) 934-4056
(713) 934-7011 (facsimile)

ATTORNEY FOR APPLICANTS